

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES SECURITIES AND  
EXCHANGE COMMISSION,

Plaintiff,

vs.

STEFAN QIN, VIRGIL TECHNOLOGIES  
LLC, MONTGOMERY TECHNOLOGIES  
LLC, VIRGIL QUANTITATIVE  
RESEARCH, LLC, VIRGIL CAPITAL LLC,  
and VQR PARTNERS LLC,

Defendants.

**Case No.: 20-cv-10849 (JGLC)**

**JOINT STIPULATION**

Petitioner Robert A. Musiala, Jr. in his capacity as the Court-appointed receiver (“Receiver”), by and through his attorneys of record, and non-party respondents Nasir Adaya and Phuong Nguyen (“Respondents”) (collectively, the “Parties”), make the below stipulation:

WHEREAS, on August 4, 2023, the Receiver filed a motion to compel the turnover of the Disputed Assets (“Motion”);

WHEREAS, Respondents have sought discovery in advance of opposing the Motion (“Discovery Requests”);

WHEREAS, the Parties have met and conferred to address disputes related to the Discovery Requests and set a schedule by which the Parties will finalize their briefing with respect to the Motion.

**NOW THEREFORE, IT IS HEREBY STIPULATED**, subject to Court approval and order, and agreed to by and between the Parties, through their respective counsel of record, that:

1. By September 15, 2023, the Parties shall substantially complete all document production related to the Discovery Requests.

2. By October 27, 2023, Respondents shall submit their Opposition to the Receiver's Motion.

3. By November 15, 2023, the Receiver shall submit his Reply in further support of the Motion.

4. Nothing in this Joint Stipulation restricts any Party from filing a discovery motion in the future.

Dated: September 8, 2023  
New York, New York

Respectfully submitted,

**BAKER & HOSTETLER, LLP**

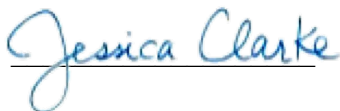
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*Attorneys for the Respondents*

\* \* \*

SO ORDERED:



JESSICA G. L. CLARKE  
United States District Judge

September 11, 2023  
New York, New York